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13 ROOTS READY MADE GARMENTS CO. W.L.L.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION
17

18 ROOTS READY MADE GARMENTS CO.
W.L.L.,

19 Plaintiff,
20

21 v.

22 THE GAP, INC., a/k/a, GAP, INC., GAP
INTERNATIONAL SALES, INC., BANANA
23 REPUBLIC, LLC, AND OLD NAVY, LLC

24 Defendants.
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Case No. C 07-03363 CRB

**JOINT PROPOSED VOIR DIRE
QUESTIONS**

Plaintiff Roots Ready Made Garments Co., W.L.L. (“Roots”), and Defendants Gap International Sales, Inc., The Gap, Inc., Banana Republic, LLC, and Old Navy, LLC (collectively “Gap”) jointly ask that, in addition to its customary questions, and in addition to the questions in the proposed juror questionnaire, the Court address the following areas in its oral *voir dire* of jurors. Gap reserves the right to propose additional *voir dire* questions.

1. What is your area of residence?
2. What is your occupation?
3. What do you do at work?
4. Who do you work for?
5. How long have you been on this job?
6. What prior jobs have you had?
7. What is the longest time you have worked for one employer?
8. What is the highest level of education you have obtained?
9. What is the occupation of your spouse, domestic partner and/or other adults in your household?
10. Have you or anyone close to you ever served in the military? If yes, who, when, what branch and assignment?
11. Have you or anyone close to you ever owned a business? If yes, who, and what type of business? Is the business still operating? Did you/they have any employees? If yes, how many?
12. Have you or anyone close to you ever participated in any agreement that involved a franchise or the sale or distribution of goods?
13. Have you or anyone close to you ever worked at:
 - a franchise;
 - a retail store;
 - a company involved in international distribution or sales?
14. Have you ever worked at or with a company that did business in the Middle East?
15. Do you use email in your work? If yes, what volume of email do you receive in a typical day?
16. Have you or anyone close to you had any experience in business negotiations?
17. Have you or anyone close to you had any experience writing, negotiating, reviewing or managing contracts?

- 1 18. What other experiences have you had with contracts?
- 2 19. Have you or anyone close to you ever been involved in any business dispute?
- 3 20. Have you ever you or anyone close to you ever been involved in any dispute
- 4 where one of the parties claimed the other committed fraud or was dishonest?
- 5 21. When hearing about a dispute between a large corporation and a smaller
- 6 company, do you tend to start off believing that the large corporation is trying to
- 7 take advantage of the smaller company?
- 8 22. Have you or anyone close to you ever sued or been sued? If yes, what was
- 9 involved? How was the matter resolved? Were you satisfied with the way the
- 10 matter was resolved?
- 11 23. To your knowledge, have any of your employers been involved in any lawsuits?
- 12 If yes, how did the litigation affect you or your position, if at all?
- 13 24. Have you ever served on a jury before? If yes, how long ago? Was it a civil or
- 14 criminal case? Did the jury reach a verdict? How did you feel about your jury
- 15 service?
- 16 25. Have you ever served as a jury foreperson?
- 17 26. Have you or anyone close to you ever testified in court? If yes, in what type of
- 18 case and on what subject?
- 19 27. Do you or anyone close to you have any specialized training in contract or
- 20 business law?
- 21 28. Have you ever known anyone who worked for the Gap? Did they discuss their
- 22 experience with you?
- 23 29. Have you or anyone you know had any negative experiences with and/or negative
- 24 impressions of the Gap?
- 25 30. Have you or any close friend or family member lived in the Middle East?
- 26 31. Have you or any close friend or family member worked in the Middle East?
- 27 32. Do you speak or read Arabic?
- 28 33. Could you fairly and impartially consider the testimony of a witness who testifies
- through an Arabic translator?
34. Would you tend to view the testimony of a witness who testifies through an
- Arabic translator to be less believable than any other witness?

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Dated: September 19, 2008

Respectfully Submitted,
KEKER & VAN NEST, LLP

By: /s/ Daralyn Durie
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GAP INTERNATIONAL SALES, INC.,
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Dated: September 19, 2008

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